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August 5, 1994

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: WRC-95 (IC Dkt. No. 94-31) (Reply Comments)

Dear Sir:

Transmitted herewith, on behalf of Motorola Satellite Communications, Inc. and Iridium, Inc., are an original and four copies of their joint Reply Comments in response to the Commission's May 5, 1994 Notice of Inquiry in IC Docket No. 94-31, In the Matter of Preparation for International Telecommunications Union World Radiocommunications Conferences.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,

James G. Ennis

James G. Ennis
Director, Licensing Affairs

JGE/cm
Enc.6

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Preparation for International	)	IC Docket No. 94-31
Telecommunication Union	)	
World Radiocommunication	)	
Conferences	)	

Reply of Motorola Satellite Communications, Inc. and Iridium, Inc.

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Dated: August 5, 1994

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Reply of Motorola Satellite
Communications, Inc. and Iridium, Inc.

Motorola Satellite Communications, Inc. ("Motorola") and Iridium, Inc. ("Iridium") (hereafter jointly referred to as "Motorola") hereby offer their reply to the initial comments filed in response to the Federal Communications Commission's ("Commission's") Notice of Inquiry ("NOI") released May 5, 1994 in the above-captioned proceeding.

I. VGE Report

A. VGE Simplified Regulations.

In Motorola's initial comments, it supported the early implementation of the VGE Simplified Regulations, subject to the resolution of shortcomings in the proposed text that have been or will be identified. It gave some examples of shortcomings in the text dealing with procedural issues.

Summary

1. Motorola Satellite Communications, Inc. and Iridium, Inc. (jointly referred to hereafter as "Motorola") support addressing the VGE Report at WRC-95 but agree that structural and temporal controls should be built into the WRC-95 process to prevent debate on the VGE Report from detracting from consideration of MSS issues.

2. Motorola supports a change to the Simplified Procedures to protect the MSS coordination procedures embodied in Res. 46.

3. Motorola supports deleting the last sentence in FN 731E and modifying FN 735A.

4. Motorola continues to support generic MSS allocations.

5. Motorola generally supports a new MSS allocation at 1675-1710 MHz but does not see the utility of an MSS allocation at 2390-2400 MHz.

6. Motorola supports a revised MSS allocation of 35 + 35 MHz at the 2 GHz band but opposes advancing the date of its use from 2005 to 2000.

7. Motorola believes spectrum above 16 GHz is suitable for MSS feeder links. It believes the approach being taken by ITU-R TG 4/5 should be followed to provide adequate spectrum for both FSS and MSS feeder links.

8. Motorola supports some of the proposals suggested by other commenters for improving the WRC preparatory process in the U.S.

While Motorola continues to hold that view, it shares the concerns expressed by Comsat World Systems (CWS), and echoed by others, that "the VGE agenda item could consume the resources and time available to the Conference and unduly distract from the MSS issues which should have priority and must be resolved at WRC-95."[1]

Consistent with Motorola's support for "early implementation" and its concern that the VGE agenda could take a disproportionate level of time and resources of WRC-95, Motorola supports the solutions proposed by two of the commenters:

1. CWS proposed that "the VGE issues [be] in a separate committee at the Conference, [and] a time limit could be placed on the debate [of the VGE issues] at the plenary sessions."[2]
2. AMSC proposed that "at least two equal committees should be formed at the Conference -- one for VGE matters and one for MSS matters."[3]

With organizations and controls such as these built into the

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[1] Comments of Comsat World Systems ("CWS"), at 8.

[2] CWS Comments, at 8.

[3] Comments of American Mobile Satellite Corporation ("AMSC"), at 18.

Conference structure and methods of work, Motorola believes that the VGE Report can be dealt with at WRC-95 in an efficient and effective manner. The outcome could be a new set of regulations which are effective, easier to use and more transparent. If there are contentious issues that cannot be resolved within the limits established, this resolution should be deferred until WRC-97.

Motorola also shares the views expressed by several parties, such as CWS, that are related to the "sheer magnitude of the task of examining the VGE Report".[4] However, despite the amount of work, WRC-95 does not begin for another 14 months. Motorola believes that this is adequate time for interested parties to review the VGE Report. It will not be any easier to deal with the VGE Report for WRC-95 than for WRC-97 and the implementation of the Simplified Regulations at WRC-95 will bring early benefits.

Two commenters, TRW and Constellation, identified concerns with the Rules of Procedure and the "incorporation by reference" elements of the VGE Report. With respect to the Rules of Procedure, TRW expressed a concern that "important procedural

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[4] CWS Comments, at 8.

rules affecting the rights and obligations of administrations will effectively be removed from the direct oversight of ITU members."[5] While this may be a valid comment with respect to the current practice followed by the Radiocommunication Bureau, the new Rules of Procedure will follow the conditions of the 1992 ITU Convention (Article 12, Nos. 168 and 169) and the Constitution (Article 14, No. 95). Under these provisions, Administrations will have two opportunities to provide comments. In addition, there is a process which permits appeal to the next WRC if an Administration is not satisfied with the resolution of its concerns. Indeed, Motorola foresees that the new procedure for establishing the Rules of Procedure will be a major part of the "transparency" of the Simplified Regulations.

Constellation expressed concern that "incorporation by reference...should not be used to delegate difficult decisions regarding inter-service sharing criteria to individual ITU-R Study Groups."[6] This view is contrary to the traditional position of the United States that the ITU-R (previously CCIR) Study Groups were the best place to deal with complex technical

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[5] Comments of TRW, Inc. ("TRW"), at 3.

[6] Comments of Constellation Communications, Inc. ("Constellation"), at 3.

matters. Motorola favors the "incorporation by reference" element of the VGE Report because it believes that the ITU-R Study Groups continue to be the best location for discussions to ensure that U.S. technical concerns are accommodated in the regulations.

B. Comments on Resolution 46

In its comments, CWS addressed the issue of an exclusionary text (i.e., default-means-agreement) in Res. 46 and in the Simplified Regulations.[7] Motorola agrees with CWS that during the coordination process there is a strong requirement for a default mechanism by which an administration's failure to request coordination is automatically treated as consent to the proposal. There is now no such provision in Res. 46 but, as pointed out by CWS, there is one in the Simplified Regulations.[8]

There is, however, a different problem with the coordination procedure in the Simplified Regulations. The onerous requirement under RR 1073 (Article II) for administrations seeking coordination, to send out all of the Appendix 3 information to administrations which may be affected, is replaced in Res. 46 by

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[7] CWS Comments, at 11-16.

[8] CWS Comments, at 13.

Section 2.7.2, whereby the Bureau publishes the Appendix 3 information in the Weekly Circular. The advantage of this Res. 46 text is that the administration seeking coordination is not required to identify all of the administrations which may be affected and to distribute the Appendix 3 information to them.

This efficient, time-saving feature in Res. 46 was not clearly and effectively included in Article S9 of the Simplified Regulations. This could be done by replacing 3.10 to 3.12 bis in Article S9 by Sections 2.7 and 2.8 from Res. 46. In addition, consequential changes in Sections 3.13 - 3.16 would be required.

Motorola believes that the coordination procedures in Res. 46 and in the Simplified Regulations would be more effective and less onerous for administrations if the points raised by CWS and those outlined above were implemented.

Additionally, at the recent meeting of ITU-R Task Group 8/3, based mainly on input documents from the U.S. and the ITU Radiocommunication Bureau, a document (8-3/Temp/13(Rev.1)) was prepared which listed, inter alia, the shortcomings in substance and application of Res. 46. These are mostly of a minor nature and likely can be easily addressed at WRC-95. To this end, the main elements of this document should be part of the U.S. proposals to WRC-95.

II. Mobile Satellite Service

Commenters addressing MSS matters expressed universal agreement that additional spectrum must be allocated at WRC-95 for MSS service links. These comments concerned three primary aspects of spectrum usage: revisions to current MSS allocations; conversion to a generic MSS allocation of the service-specific categories (i.e., maritime-, aeronautical- and land-mobile); and new allocations.

1. Revisions to current MSS allocations

At WARC-92 several new primary MSS allocations were adopted. However, in some instances footnotes were also adopted that imposed constraints on these MSS allocations that cause them effectively to have less than primary status. Removing these constraints and allowing the MSS allocations to become truly co-primary will make them more useful. Some of the footnoted constraints are identified and discussed below.

FN 731E. Several commenting parties, including TRW, Loral/Qualcomm Partnership, L.P. ("LQP"), Ellipsat Corporation, Constellation, and AirTouch, identified an internal inconsistency in FN 731E that needs to be resolved.[9] The first part of FN 731E

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[9] TRW Comments, at 6; Comments of Loral/Qualcomm Partnership, L.P. ("LQP"), at 15-16; Comments of

states that a mobile earth station operating under a primary allocation in the 1610-1626.5 MHz band shall not produce an e.i.r.p. density greater than specified levels. The last sentence of the footnote states that such mobile earth stations "shall not cause harmful interference to" stations in the (primary) aeronautical radionavigation service, (primary) fixed service stations, and electronic aids to air navigation [i.e., GLONASS]. These two sentences in FN 731E are inconsistent. Further, the last sentence is not consistent with the traditional concept of band sharing between two primary services (in this case, the MSS service and either the Fixed Service or the aeronautical radionavigation service). Primary services share bands by a "first in time, first in right" rule. The last sentence of 731E would go against this general rule and subordinate all MSS uplinks to other services, even though MSS uplinks have a primary allocation and even if the MSS uplink is first in time.

The solution proposed by the commenting parties, which Motorola supports, is to delete the last sentence of FN 731E.

Ellipsat Corporation ("Ellipsat") at 9-10; Constellation Comments, at 5; Comments of AirTouch Communications ("AirTouch") at 7.

This change should be proposed at WRC-95. This matter was also addressed at the recent meeting of ITU-R Task Group 8/3 and the Task Group is seeking views from Administrations on the anomaly (see Document 8-3/Temp/13(Rev1)).

FN 735A. This footnote properly protects current Metsat and Metaid services in the band but also requires MSS systems to "not constrain the development" of future meteorological systems. Such a constraint, based on unknown, future circumstances, effectively inhibits the use of the band by MSS systems, since financial risks with respect to future operation would be large. Accordingly, this part of the footnote should be deleted.

2. Conversion from Service-Specific to Generic MSS Allocations. Generic MSS allocations have been U.S. policy for some time. Motorola concurs with AMSC's comments[10] that the U.S. should continue to press for generic MSS allocations at WRC-95. This action is consistent with Recommendation 1/7 of the VGE Report which urges, "WRC's should, wherever possible, allocate frequency bands to the most broadly defined services to provide the maximum flexibility to administrations in spectrum use, taking into account technical, operational, economic and other

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[10] AMSC Comments, at 9.

relevant factors." This approach to spectrum utilization efficiency is consistent with current footnote protection of maritime and aeronautical safety services.

3. New MSS Allocations. Although several commenters exhort the Commission to find and advocate new spectrum allocations for MSS at WRC-95, only Motorola, AMSC and LQP offered specific proposals in their initial comments.

1675-1710 MHz. Motorola has proposed that at WRC-95 the U.S. seek to extend the Region 2 co-primary allocation of MSS in the 1675-1710 MHz band to a worldwide allocation. To support that proposal, Motorola has (or, in some cases, will be) contributed a technical paper to several elements (TG 8/3, WP 7C, WP 8D) of the ITU-Radiocommunications Sector describing techniques for sharing the band between MSS, Meteorological Satellites and Meteorological Aids. Useful and productive consultations with NOAA representatives have considerably aided in the development of the sharing techniques described in the ITU-R paper.

2390-2400 MHz. Both LQP and AMSC have proposed the allocation of the band 2390-2400 MHz for MSS. However, LQP

proposes the band in the Earth-to-space direction[11] while AMSC, because of concerns about microwave ovens and other ISM radiators in the adjacent band, proposes the band be allocated in the space-to-Earth direction.[12]

Motorola is concerned about interference to service by out-of-band emissions from ISM radiators should the band 2390-2400 MHz be allocated to MSS, whatever the direction. Motorola believes it is counter-productive to have spectrum allocated to MSS that cannot be totally and efficiently used. Therefore, Motorola proposes that unless other MSS operators definitely believe they can use this spectrum, that MSS operators "pass" on this questionable band and allow others to struggle with the high level of ambient noise inherent to its use.

2 GHz bands. In its initial comments, Motorola expressed the view that at WRC-95 the 40 + 40 MHz MSS allocation that was adopted at WARC'92 in the 1970-2010 MHz/2160-2200 MHz bands should be modified in light of the Commission's PCS decision, and that 35 + 35 MHz should be allocated at WRC-95 in the 1990-2025 MHz/2165-2200 MHz bands instead. Motorola notes that AMSC also

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[11] LQP Comments, at 19.

[12] AMSC Comments, at 15.

advocated such an allocation in its initial comments.[13]

Constellation also proposed modifications to improve the 2 GHz MSS allocations.[14] It proposed to add the 10 MHz MSS allocation in the 2160-2170 MHz band (which is currently allocated only to Region 2) to Regions 1 and 3 as well and to move the 1970-1990 MHz MSS allocation in order to avoid overlap with the PCS band plan.

Advancing the 2005 date. In its initial comments, Motorola opposed advancing the date of entry for the 2 GHz bands from 2005 to the year 2000 or earlier. Motorola opposes advancing this date because the band is supposed to be used for FPLMTS, because standards for FPLMTS will not be known until 1998 at the earliest, and because construction of satellites using this band cannot begin until after that date if the FPLMTS standards are to be observed.

Comsat Mobile Communications ("CMC") argues that the ITU-R Study Group responsible for FPLMTS development has supported the need for satellite systems to have early spectrum access to all FPLMTS bands prior to the year 2000. However, when Task Group

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[13] AMSC Comments, at 11-13.

[14] Constellation Comments, at 7-8.

8/1 first considered this issue, in June 1993,[15] it did not consider the long-lead time necessary to construct a satellite system and the implications for compliance with FPLMTS standards of a satellite system built before the standards are adopted. The Task Group 8/1 recommendation[16] needs to be reconsidered in light of this fact.

Furthermore, the recommendation suggests that "pre-implementation trials and testing"[17] (emphasis added) may be needed before the year 2000, not operational systems. Experiments can be conducted on a RR 342 basis without needing to advance the 2005 date for operational systems.

The Association for Maximum Service Television, Inc. (MSTV) opposed advancing the 2005 date but for another reason. MSTV points out that a solution to the broadcast auxiliary problem needs to be found before the Commission advances the date of

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[15] Comments of Comsat Mobile Communications ("CMC") at 11-12.

[16] ITU Radiocommunication Study Groups, Task Group 8/1, Draft New Recommendation, Document 8/104E, "Spectrum Considerations for Implementation of Future Public Land Mobile Telecommunication Systems (FPLMTS) in the Bands 1885-2025 MHz and 2110-2200 MHz" (June 18, 1993).

[17] Id., at Recommends 2.6.

entry of MSS into the 2 GHz bands.[18] In particular, if it is necessary to require broadcast auxiliary systems to migrate to higher frequencies, this will take time to implement. This militates against advancing the 2005 date.

The same is true for Fixed Service operations in the band. In Motorola's view, Fixed Service (FS) Systems will need to be relocated before the band can be used. Although Comsat Mobile Communications points to the FS channelization plan recommended by Study Group 9 as evidence that there are "gaps" between FS channels that MSS could use,[19] the fact is that many Administrations -- including the U.S. -- do not follow this channelization plan.

III. Feeder link spectrum and RR 2613

A number of commenters addressed the issue of feeder links for non-GSO MSS systems. As the Commission knows, Motorola proposes to use the 19.4-19.6 GHz (downlink), and 29.1-29.3 GHz (uplink), FSS allocations for IRIDIUM® system feeder links. Some comments indicated that spectrum above 16 GHz was not suitable

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[18] Comments of The Association for Maximum Service Television, Inc. ("MSTV"), at 8-10.

[19] CMC Comments, at 12-13.

for non-GSO MSS feeder links. While Motorola appreciates that certain system designs are better suited for feeder links below 16 GHz, the 20/30 GHz spectrum is technically and operationally suitable for a system such as IRIDIUM®, and Motorola urges that the U.S. make the necessary proposals to WRC-95 to ensure the continued availability of this spectrum for feeder links. Specifically, the U.S. should adopt the approach currently being developed in the ITU-R TG 4/5 under which FSS allocations would be designated as non-GSO MSS feeder link bands, FSS GSO network bands, or bands available for both types of uses on a co-equal basis.

The approach being taken by the ITU-R TG 4/5 also involves modification of RR 2613. While Loral, Qualcomm, TRW, Teledesic, AirTouch, Comsat Mobile Communications and Comsat World Systems all endorse this approach in their comments, Hughes believes that "the primary status of GSO services with respect to non-GSO services should be maintained as established by Radio Regulation 2613 in the FSS allocations."[20] Hughes may not be aware that the ITU-R TG 4/5 determined at its most recent meeting, based upon an input document from the Radiocommunication Bureau (RB), that

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[20] Comments of Hughes Space and Communications Company and Hughes Communications Galaxy, Inc. ("Hughes"), at 6.

Regulation RR 2613 is fundamentally flawed. Its present provisions do not make clear or indicate how protection for the GSO and non-GSO MSS feeder links are to be accomplished. Therefore, no finding is made by the RB at the time of registration of a non-GSO MSS feeder link or GSO FSS network on this matter, and thus RR 2613 does not protect GSO networks. The approach being taken by ITU-R TG 4/5 shows promise of providing a way to provide equal and unambiguous protection for both GSO and non-GSO MSS feeder links, and should be made part of the U.S. proposals to WRC-95.

GE-Americom has suggested that because of the recently initiated 28 GHz NRM, that the FSS allocation 27.5-29.5 GHz should not be on the agenda for WRC-95.[21] However, the agenda for WRC-95 (Task Group 4/5) has already been agreed upon, and it includes an explicit agenda item to designate spectrum to be used for non-GSO MSS feeder links. RR 22 provides that FSS allocations may be designated for such feeder links but this has never been done. Because many FSS bands are rapidly filling up with GSO FSS systems, it is imperative that non-GSO MSS feeder link allocations be designated at WRC-95.

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[21] Comments of GE American Communications, Inc. ("GE Americom"), at 5.

The 28 GHz NRM should not prevent the U.S. from proposing MSS feeder links in the 27.5-29.5 GHz FSS allocations. A recently completed international conference preparatory meeting for WRC-95 (Task Group 4/5) has endorsed the requirement for MSS feeder links in this part of the spectrum. Moreover, the 28 GHz negotiated rulemaking, apart from being solely a domestic matter, will not address the issue of whether or not spectrum in this band should be used for MSS feeder links. Rather, its scope is limited to the issue of whether the FSS and proposed Local Multipoint Distribution Service can share spectrum on co-frequency basis. Even if the negotiated rulemaking fails to result in a consensus on co-frequency sharing, it is far more likely that this would lead to a band segmentation plan rather than a decision to exclude MSS feeder links from the band. Indeed, the Commission has stated in both the LMDS and Big LEO proceedings that it expects to assign spectrum in the Ka-band for Big LEO feeder links.

In summary, Motorola:

- supports the work of TG 4/5 in dealing with RR 2613;
- supports making proposals to WRC-95 for C, Ku, and Ka band for non-GSO MSS feeder links (including the use of FSS allocations in the Reverse Band Working (RBW) mode

where possible below 16 GHz); and

- urges that sufficient FSS spectrum in the range 27.5-29.5 GHz should be made available for non-GSO MSS feeder links.

IV. U.S. Preparations for Future WRC's

AMSC recommended accelerating the WRC preparatory process to have U.S. proposals in place six to eight months prior to a WRC[22], having official IRAC membership on the IAC and establishing a joint FCC/NTIA committee that would include the private sector to improve cooperation between governmental and private users of the spectrum.[23] COMSAT World Systems and COMSAT Mobile Communications recommended establishing a WRC Preparatory Office that would name an Executive Coordinator for each of the next two WRCs.[24] In addition, the COMSAT organizations called for more intense coordination with IRAC.[25]

Motorola supports AMSC's recommendation to accelerate the WRC preparatory process to allow the U.S. sufficient time to

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22 AMSC Comments, at 22.

23 AMSC Comments, at 23-25.

24 CWS Comments, at 16-18; CMC Comments, at 34-36.

25 CWS Comments, at 17; CMC Comments, at 35.

promote and coordinate U.S. proposals in advance of a WRC. First, proposals should be completed by the Spring of the year of a given WRC, as AMSC suggests (assuming that a WRC takes place during the fourth quarter). In addition, Motorola believes that the preliminary proposals should be prepared by the end of the previous year to allow more time for initial international consultations.

Motorola also supports AMSC's, COMSAT World Systems' and COMSAT Mobile Communications' call to improve communications between the FCC/private sector and NTIA/IRAC preparatory processes. Specifically, AMSC's suggestions that IRAC members should participate in the IAC as official members and that a joint FCC/NTIA committee should be established with private sector involvement have special merit. The current process is fraught with problems given the exclusion of the private sector from the FCC/NTIA WRC preparatory dialogue. Direct IRAC/private sector dialogue would help identify and resolve internal differences in U.S. governmental and private sector positions early and maximize the number of U.S. proposals that would be available for early international consultation. The IRAC/private sector dialogue can be managed to fully protect U.S. national security concerns.

In addition, Motorola supports study of the proposals made by CMC and CWS calling for a WRC Preparatory Office that would name an Executive Coordinator for each WRC. Such actions might be undertaken for one WRC as an experiment and then evaluated jointly by the Government and the private sector to assess their effectiveness.

In their comments, ARINC, CWS and CMC call for a permanent IAC.[26] Motorola is strongly opposed to this idea. The focus and agenda of each WRC are sufficiently unique to warrant tailoring the IAC structure and membership to that WRC. A permanent IAC would tend to freeze private sector leadership involving them in issues not germane to their personal expertise or organizational interests. On the other hand, establishing a new IAC for each WRC opens the door for leadership roles for new private sector participants who bring the most appropriate expertise and fresh approaches to the problems facing a WRC. "Institutional memory" and policy continuity can be carried forward by government officials and those private sector IAC members whose interests require them to participate in multiple WRCs.

Future WRC Agendas. Teledesic calls for the inclusion of

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[26] CWS Comments, at 17; CMC Comments, at 35; Comments of Aeronautical Radio, Inc. ("ARINC"), at 2.

Recommendation 719 (WARC-92) on the 1997 agenda, noting that this recommendation raises issues such as the need "to include non-geostationary satellite systems within any deliberations regarding the compatibility of FSS and MSS systems." It also calls for the establishment of a single service definition for MSS and FSS.[27] Motorola opposes such action. It is becoming increasingly clear that LEO MSS systems and FSS cannot be coordinated in the same bands. WRC-95 Task Group 4/5 recognized this problem at its June 1994 meeting when it began work on a plan to assign FSS priority status in some bands, MSS feeder links priority status in other bands, and to assign spectrum to MSS feeder links or FSS on a first-come, first-served basis in still other bands. It was realized at the meeting that true parity between FSS and MSS feeder links is impossible to coordinate within a given band. While establishing a single service definition for FSS and MSS has superficial appeal, the realities of these services dictate that they remain separate for the foreseeable future and that band management proceed accordingly.

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[27] Comments of Teledesic Corporation, at 13-16.

Conclusion

1. Motorola supports addressing the VGE Report at WRC-95 but agrees that structural and temporal controls should be built into the WRC-95 process to prevent debate on the VGE Report from detracting from consideration of MSS issues.

2. Motorola supports a change to the Simplified Procedures to protect the MSS coordination procedures embodied in Res. 46.

3. Motorola supports deleting the last sentence in FN 731E and modifying FN 735A.

4. Motorola continues to support generic MSS allocations.

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